



# COAL DUST

## NR 445 Technical Advisory Group March 2002

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Bureau of Air Management



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# Issue

- ◆ Revised Coal Dust TLV by ACGIH in 2000
- ◆ Evaluate whether existing regulations (I.e., NR 415 - fugitive dust) adequate



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# Analysis - NR 415

- ◆ Reviewed requirements of NR 415
- ◆ Interviewed owners and operators of coal handling facilities (Utilities and Paper Companies)
- ◆ Interviewed DNR regional staff
- ◆ Reviewed Ambient Monitoring Data



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# Current Implementation of NR 415

- ◆ Fugitive dust control plans required in some permits
- ◆ Other cases NR 415 requirements in permits
- ◆ Ability to make adjustments to plans/practices as needed
- ◆ Additional authority to require additional management practices



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# Monitoring data

- ◆ Most existing monitoring data near coal piles is TSP, because “nuisance dust” was the traditional issue
- ◆ Limited data for PM10 (Only 1 coal pile has PM10 monitor nearby)
- ◆ Preliminary analysis (both TSP and PM10) suggested that AAC could rarely be exceeded but the Department is reviewing archived PM10 filters to be sure.



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# Proposal

- ◆ List coal dust with AAC and thresholds
- ◆ Exempt sources if:
  - ◆ a DNR approved fugitive dust control plan or permit conditions that meet or are equivalent to NR 415 RACT requirements, and
  - ◆ Includes an ambient monitoring program if source handles > XXX tons/year
    - ◆ 2 years, which DNR may extend if needed
    - ◆ PM 10 monitors
- ◆ Will allow for adjustments to fugitive dust plans/permit conditions, based on monitoring results